

SUPPLEMENTAL DECLARATION OF VICTORIA SLATTON, ESQ.

I, Victoria Slatton, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. I make this declaration to supplement my declaration filed earlier in this case. ECF No. 11.
3. My firm filed a bond motion with Krome Detention Center on N.M.B.'s behalf on July 29, 2025. Shortly after filing, we received an email informing us that the Krome rejected the bond application. Krome's response stated the reason for this rejection was that it lacked jurisdiction over the Alligator Alcatraz facility. A true and correct copy of this rejection by the Krome Immigration Court is attached hereto as **Exhibit A**.
4. After receiving this rejection, I contacted the Miami Immigration Court to determine whether we could file a bond motion on N.M.B.'s behalf. I spoke with a court employee who identified herself as a supervisor. She informed me that the Miami Immigration Court also takes the position that it lacks jurisdiction over Alligator Alcatraz, and that any bond motion filed in that court on behalf of someone detained at Alligator Alcatraz would be rejected.
5. The legal team at my firm has spoken with our client N.M.B. about the responsibilities of serving as a class representative. N.M.B. is willing to serve as a class and subclass representative in this case.

Executed on the 29th of July, 2025, at Washington, DC.

A handwritten signature in black ink, appearing to read "Victoria Slatton", with a stylized, cursive script.

Victoria Slatton

# **EXHIBIT A**



**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT**

Respondent Name:

N/A

A-Number:

[REDACTED]

Address:

REJECTION NOTICE

Date: 07/29/2025

**REJECTED FILING  
NOTICE TO ATTORNEY OR REPRESENTATIVE**

This notice is to inform you that the document(s) received by the Immigration Court on 07/29/2025 is/are being rejected for the reasons given below. When re-filing the corrected document(s) other than initiation documents, please attach this rejection notice. A copy of the corrected filing must also be served on the opposing party.

Document(s) being rejected:

Bond Request - For Submission.pdf, EOIR-  
28\_[REDACTED]\_FILING\_53050.pdf, Bond Evidence - For  
Submission\_compressed.pdf

Rejection Reason(s)

1. Rejection Reason Not Found (Other)

Rejection Explanation:

AT THIS TIME THE KROME IMMIGRATION DOESNT HAVE JURISDICTION  
OVER ALLIGATOR ALCATRAZ PLEASE CONTACT DHS FOR ADDITIONAL  
INFORMATION

**Certificate of Service**

This document was served:

Via: ☐ Mail ☐ Personal Service ☒ Electronic Service

To: ☒ Alien ☐ Alien c/o custodial officer ☐ Alien's atty/rep. ☐ DHS

By: TurciosM, ☐ Court Staff ☐ Immigration Judge

Date: 07/29/2025